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Carolina Power & Light Company PO Box 165 New Hill NC 27562 William R. Robinson Vice President Harris Nuclear Plant

SERIAL: HNP-96-087 10 CFR 50.90

MAY 31 1996

United States Nuclear Regulatory Commission ATTENTION: Document Control Desk Washington, D.C. 20555

SHEARON HARRIS NUCLEAR POWER PLANT DOCKET NO. 50-400/LICENSE NO. NPF-63 REQUEST FOR LICENSE AMENDMENT TRIAXIAL PEAK ACCELEROGRAPH LOCATION

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications (TS) for the Shearon Harris Nuclear Power Plant (SHNPP). The proposed change to TS Table 3.3-7, Seismic Monitoring Instrumentation, and Table 4.3-4, Seismic Monitoring Instrumentation Surveillance Requirements, will correct the location described for one of the three Triaxial Peak Accelerograph Recorders. Specifically, the recorder connected to the Reactor Coolant System piping is installed on Loop 2 (Loop B), and not on Loop 1 (Loop A).

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details, in accordance with 10 CFR 50.91(a), the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides an environmental evaluation that demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides page change instructions for incorporating the proposed revisions.

Enclosure 5 provides the proposed Technical Specification pages.

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In accordance with 10 CFR 50.91(b), CP&L is providing the State of North Carolina with a copy of the proposed license amendment.

To allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendment, once approved by the NRC, be issued such that implementation will occur within 60 days of issuance of the amendment.

Please refer any questions regarding this submittal to Mr. T. D. Walt at (919) 362-2711.

Sincerely,

Jun Nolumon

LSR/lsr

Enclosures:

- 1. Basis for Change Request
- 2. 10 CFR 50.92 Evaluation
- 3. Environmental Considerations
- 4. Page Change Instructions
- 5. Technical Specification Pages

W. R. Robinson, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are employees, contractors, and agents of Carolina Power & Light Company.

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My commission expires: 2 - 4 - 2000

c: Mr. J. B. Brady Mr. Dayne H. Brown Mr. S. D. Ebneter Mr. N. B. Le

Notary (Seal) ALE THE THE PARTY OF THE PARTY YARE NOTARI ***



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bc: Ms. P. B. Brannan Mr. R. K. Buckles (LIS) Mr. J. P. Cowan Mr. G. W. Davis
Mr. J. W. Donahue Ms. S. F. Flynn Mr. H. W. Habermeyer, Jr. Mr. G. D. Hicks (BNP) Mr. M. D. Hill Mr. W. J. Hindman, Mr. G. Honma (BNP) Mr. R. M. Krich (RNP) Ms. W. C. Langston (PE&RAS File) Mr. R. D. Martin Mr. W. S. Orser Mr. G. A. Rolfson Mr. L. S. Rowell Mr. R. S. Stancil Mr. T. D. Walt Nuclear Records File: HI/A-2D File: H-X-0511

ENCLOSURE 1

SHEARON HARRIS NUCLEAR POWER PLANT NRC DOCKET NO. 50-400/LICENSE NO. NPF-63 REQUEST FOR LICENSE AMENDMENT TRIAXIAL PEAK ACCELEROGRAPH LOCATION

BASIS FOR CHANGE REQUEST

Background

The Final Safety Analysis Report, Section 3.7.4, describes the seismic monitoring instrumentation system for the Harris Nuclear Plant installed to meet the guidance provided in NRC Regulatory Guide 1.12, "Instrumentation for Earthquakes," Revision 1, April 1974. Operability of the seismic instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix A of 10 CFR Part 100. The NRC's acceptance of the Harris Nuclear Plant seismic monitoring instrumentation program is documented in Section 3.7.4, NUREG-1038, "Safety Evaluation Report related to the operation of Shearon Harris Nuclear Power Plant, Units 1 and 2," dated November 1983.

Proposed Change

The proposed change to Technical Specification (TS) Table 3.3-7, Seismic Monitoring Instrumentation, and TS Table 4.3-4, Seismic Monitoring Instrumentation Surveillance Requirements, will correct the location described for one of the three Triaxial Peak Accelerograph Recorders. Specifically, the recorder connected to the Reactor Coolant System piping is installed on Loop 2 (Loop B), and not on Loop 1 (Loop A).

<u>Basis</u>

The purpose of the seismic monitoring instrumentation system is to sense, alarm, and record information on seismic disturbances to the ground and selected plant structures caused by an earthquake or other violent event. The system is composed of active and passive seismic monitors. The active portion of the system provides alarms for immediate identification of a seismic event and recordings that can be evaluated for actual shock acceleration levels and potential plant damage. The passive portion of the system provides permanent mechanically etched records of the seismic event. Information gained from the monitoring system permits evaluation of seismic effects on structures and equipment.

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As part of the passive portion of the seismic monitoring instrumentation system, the Triaxial Peak Accelerograph Recorders are single unit, triaxial, orthogonal, passive components that inscribe a permanent record on a small metal plate by a diamond-tipped stylus. This type of recording is desired due to its ability to function with total independence of any other system or power supply. Data are obtained after a seismic event by removing the plates from the field sensors, examining them under magnification, and measuring the distance from a base scribe to the peak of the active scribe.

Technical Specification Table 3.3-7, Seismic Monitoring Instrumentation, and Table 4.3-4, Seismic Monitoring Instrumentation Surveillance Requirements, describe the locations of the three Triaxial Peak Accelerograph Recorders. The locations described for the recorders located on the Steam Generator "A" pedestal and in the Reactor Auxiliary Building agree with current design drawings. The location for the third recorder is described as "Reactor Coolant Pipe (Loop 1)," whereas the recorder is actually installed on reactor coolant piping connected to Loop 2 (Loop B). The early plant design showed the recorder on Loop 1, but this was later revised, and the actual installation was on Loop 2. Current plant design drawings show the correct location, but the discrepancy with Technical Specifications was not identified. However, the loop designation is not material to either the Technical Specifications or compliance with Regulatory Guide 1.12. Regulatory Guide 1.12 states only that one triaxial peak accelerograph should be provided at a "selected location on the reactor piping." Therefore, this proposed change is administrative and does not involve any physical alterations to plant equipment. •

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ENCLOSURE 2

SHEARON HARRIS NUCLEAR POWER PLANT NRC DOCKET NO. 50-400/LICENSE NO. NPF-63 REQUEST FOR LICENSE AMENDMENT TRIAXIAL PEAK ACCELEROGRAPH LOCATION

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards determination. The bases for this determination are as follows:

Proposed Change

The proposed change to Technical Specification (TS) Table 3.3-7, Seismic Monitoring Instrumentation, and TS Table 4.3-4, Seismic Monitoring Instrumentation Surveillance Requirements, will correct the location described for one of the three Triaxial Peak Accelerograph Recorders. Specifically, the recorder connected to the Reactor Coolant System piping is installed on Loop 2 (Loop B), and not on Loop 1 (Loop A).

<u>Basis</u>

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

These recorders are passive components which serve only a recording function. They can neither initiate an accident nor serve to mitigate accident consequences. The proposed change serves only to correct the location, commensurate with design documents, for one of the three recorders described in the Technical Specifications. Accordingly, this change is administrative in nature. Therefore, there would be no increase in the probability or consequences of an accident previously evaluated. ·

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2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed correction is an administrative change to correct the location of a recorder currently described in the Technical Specifications. No physical alterations to plant equipment are being made, and there will be no changes that alter how any safety-related system performs its function. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety.

Technical Specification Bases 3/4.3.3.3 specify the acceptance level for seismic instrumentation as "consistency" with the recommendations of Regulatory Guide 1.12. Since the regulatory guide states only that one recorder should be provided at a "selected location on the reactor piping," it is not material whether it is installed on Loop 1 versus Loop 2. Therefore, the proposed change does not affect a margin of safety as defined in the Bases to the Technical Specifications.

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ENCLOSURE 3

SHEARON HARRIS NUCLEAR POWER PLANT NRC DOCKET NO. 50-400/LICENSE NO. NPF-63 REQUEST FOR LICENSE AMENDMENT TRIAXIAL PEAK ACCELEROGRAPH LOCATION

ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides the criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (3) result in a significant increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change

The proposed change to Technical Specification (TS) Table 3.3-7, Seismic Monitoring Instrumentation, and TS Table 4.3-4, Seismic Monitoring Instrumentation Surveillance Requirements, will correct the location described for one of the three Triaxial Peak Accelerograph Recorders. Specifically, the recorder connected to the Reactor Coolant System piping is installed on Loop 2 (Loop B), and not on Loop 1 (Loop A).

Basis

- The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:
- 1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.
- 2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed amendment corrects the location described in the Technical Specifications for one of the three Triaxial Peak Accelerograph Recorders. This change will neither introduce any new equipment nor will it require any existing equipment or systems to

perform a different type of function than they are currently designed to perform. As such, the change cannot affect the types or amounts of effluents that may be released offsite.

The proposed amendment does not result in a significant increase in individual or cumulative occupational radiation exposure.

The proposed correction will not result in any additional or changed surveillances or testing. Therefore, the amendment has no effect on either individual or cumulative occupational radiation exposure.

3.

ENCLOSURE 4 SHEARON HARRIS NUCLEAR POWER PLANT NRC DOCKET NO. 50-400/LICENSE NO. NPF-63 REQUEST FOR LICENSE AMENDMENT TRIAXIAL PEAK ACCELEROGRAPH LOCATION

PAGE CHANGE INSTRUCTIONS

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